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11 **DECLARATION OF COUNSEL**

13 I, Emilio Dorame-Martinez, hereby declare the following of my own knowledge under
14 penalty of perjury according to the laws of the State of California. I am over the age of eighteen and
15 am not a party to this action. I am a provisionally licensed attorney, licensed by the State of
16 California under Rule of Court 9.49. My State Bar number is PL-497095 and my supervising
17 attorney is Ramiro Rodriguez state bar number 88069. My office is jointly representing with
18 Howard Williams; the filing attorney the Plaintiff, Guida Dennis and the moving party herein. I am
19 making this affidavit as an attachment to the Motion for a Temporary Restraining Order. All of the
20 following facts are true as they relate to the following:

- 21 1. On January 11, 2021, my associate Howard Williams filed a lawsuit on behalf of the Plaintiff in
22 federal district court, case no: 1:22-at-00012.
- 23 2. On January 11, 2021, the Office of County Counsel for the County of Tulare, via phone call.
- 24 3. I informed the clerks office that my associates were suing the county of Tulare along with the
25 school district and I gave her the case number from the Federal Court System file stamps.
- 26 4. She transferred me to a lawyer who works for the office of County counsel named Chaz.
- 27 5. I gave him my name and office information and informed them my office and the other offices
28 associated with mine, we were suing the County of Tulare on behalf of the Plaintiff in Fresno
District Court.

6. In formed him we were seeking a temporary restraining order and asked if he could accept service of process on behalf of the County.
7. Chaz said he was not authorized to accept service of process on behalf of the county.
8. I called the city of Tulare and left a message with Katie, who returned my call from a private law firm and stated that she represents the city of Tulare but not the individual school districts.
9. County Counsel's office for the county of Tulare has a public email address tularecountycounseloffice@co.tulare.ca.us.
10. I contacted Cheri Crooks, the agent who is authorized to accept service of process for TCSD School district and its agents.
11. I asked her which lawyers office they use to represent the school district and she could not inform me who was representing the school district.
12. Each of the named defendants are agents of the Tulare City School District and I was informed by Ms. Crooks that she is authorized to accept legal documents on their behalf.
13. Notice was not given to any named defendant by my office because we do not have hearing date yet.
14. My associate was told by the court for the district court clerk in Fresno to wait to provide notice until after a hearing date was given.
15. Upon receiving notification by the court that a hearing on this matter is granted, my office will make all reasonable efforts to provide the notice of the hearing to opposing counsel and file with the Court an additional declaration of counsel.

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I hereby certify, that all facts and statements in the above affidavit are true to the best of my knowledge. I swear to this under the penalty of perjury and do so execute this document on the date specified below.

Emilio Dorame-Martinez

Dated: 1/12/21

Emilio Dorame-Martinez